To whom it may concern:

Thank you for the opportunity to comment on the FCC's Notice of Proposed Rulemaking concerning its Hurricane Katrina panel report (EB Docket No. 06-119). While the preliminary report appears to cover well what the failures and the successes were; including a synopsis of how the communications industry and government should pre-position for disasters, "to improve network resiliency; improving recovery coordination ..... , and improving the operability and interoperability of emergency communications in times of crisis" this raises the question of where are the resources for the industry to accomplish such lofty goals? As a telecommunications planner for an electric utility I know there are many reasons why some networks are more or less resilient than others, among these are budgetary constraints, manpower availability, and political or governmental restrictions. While streamlining Special Temporary Authority procedures is a step in the right direction it falls short in addressing communication infrastructure needs for future disasters. As noted in the Commissions report some of the most resilient systems were those in the private sector, especially those of the various utilities. It is time to recognize the benefits of having a robust utility communications infrastructure and ask what the UTC can do to help our industry maintain its vital role in disaster recovery operations.

Given the nature of our utility business, and events such as Hurricane Katrina, it is a mandate the telecommunications engineer to consider the worse case scenario when designing it's wireless system or infrastructure.

However, due to the constraints mentioned previously, a compromise is usually made based upon available resources. One area where resources affect reliability is the dearth of available frequencies, not only in the VHF and UHF bands, but also in the microwave bands as well. For example, as technology improves in the public wireless sector the utility industry is faced with the steady erosion of available microwave frequencies.

Witness the loss of the Two (2) GHz band and encroachment into the six (6) GHz band by many new products and you can understand the telecommunications engineer's dilemma. In trying to build a reliable long range microwave backbone system more resources are required to accommodate the shorter path lengths caused by higher (e.g Eleven GHz) microwave frequencies available for use. Even when available, the engineer must sometimes accommodate nonstandard pairings and bandwidth restrictions to work around existing coordinated users.

Usually the public and the FCC is unconcerned about utility industry's communications needs until a catastrophic event such as Katrina occurs and, even then, the concentration of priorities seems to focus on the public safety sector first and the utilities as an afterthought. As the FCC appears to be listening now, it is in our best interest to make the best case we can to request more favorable treatment in the availability and retention of frequencies we now hold, and consideration and inclusion of our industry in any future offerings.

Ron Brown
Telecom. Engineering
Northeast Utilities
brownrf@nu.com
(860) 665-3404 phone
(860) 665-5585 fax